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**Congress of the United States**  
**House of Representatives**  
**Washington, DC 20515-4209**

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IN EUROPE (U.S. HELSINKI COMMISSION)

February 7, 2022

The Honorable Deb Haaland  
Secretary  
Department of the Interior  
1849 C St. N.W.  
Washington, DC 20240

Tracy Stone-Manning  
Director  
The Bureau of Land Management  
760 Horizon Drive  
Grand Junction, CO 81506

Dear Secretary Haaland and Director Stone-Manning,

I appreciate the Bureau of Land Management's (BLM's) commitment to increasing the use of fertility vaccines to help manage the wild horse and burro population on federal land. However, I remain concerned that the agency's primary plan for herd management is to use large-scale removals in 2022 and beyond. I ask that you work to suspend all roundup activities until appropriate range assessments have been completed, animal welfare concerns have been addressed, and a robust fertility control vaccine plan has been implemented.

Americans overwhelmingly cherish wild equines and want to see them protected. These horses and burros are icons and symbols that embody the notion of American freedom. However, the agency's plan to roundup 22,000 wild horses and burros this year, permanently removing 19,000 of them, puts the welfare of these animals in danger and marks a huge step backward for the program. These removals are undoubtedly part of the BLM's controversial plan, "Report to Congress: An Analysis of Achieving a Sustainable Wild Horse

and Burro Program,” which was released in May 2020 under the Trump Administration. As you know, I have been a vocal opponent of this plan.

The May 2020 removal plan is unsustainable and comes at great risk to the animals and taxpayers. It merely continues what BLM has always done—removing horses and burros and confining them in holding facilities—but at an accelerated rate. The plan calls for removing 18,000–20,000 per year over a period of 15–18 years, or until the Appropriate Management Level (AML) is reached. In the first five years alone, the plan is projected to cost nearly \$1 billion dollars and more than double the number of captive wild horses and burros in government holding facilities, from 59,000 in 2021 to 140,000 in 2025.

We have seen that removals simply do not work. The agency has been removing horses for years, which has resulted in an increasing number of horses in holding without achieving BLM’s stated management goals. In 2001, there were a total of 55,300 wild horses and burros (45,600 on-range, 9,700 off-range), but by 2011 there were 79,100 (38,500 on-range, 40,600 off-range) and 145,200 in 2021 (86,200 on-range, 59,000 off-range). The National Academy of Sciences (NAS) has cautioned the agency on removals, noting they are counterproductive and cause compensatory reproduction on the range. The current model of rounding up and placing wild horses and burros in government holding facilities is unsustainable. If BLM continues down this road, these horses will be put at greater risk of slaughter.

Further, such large-scale removals threaten to reduce wild herds to small, remnant populations that will not be genetically viable or self-sustaining as required by federal law. It would take the population down to the number that existed back in 1971 when Congress passed the Wild Free-Roaming Horses and Burros Act because these animals were “fast disappearing from the American scene.”

I share the American public’s serious concerns about the welfare of these animals—both during the roundups and in the holding facilities. Documentation has repeatedly revealed horses dying from broken legs and broken necks, and young foals being chased by helicopters then left orphaned on the range after they couldn’t keep up while their mother was captured. Freedom of Information Act (FOIA) documentation has noted horses dying in short-term holding facilities from skull, leg, and neck fractures, and mares dying from birthing complications. Others are listed as “found dead in pen,” which may be a result of capture myopathy caused by the stress of the roundup.

In the recent Pancake Complex roundup, the AP published extremely concerning reports describing a yearling being chased by a helicopter contractor on a broken leg, ultimately dying as a direct result of the roundup. While the agency claimed the roundup was necessary, saying the land can only support 361–638 horses, the BLM continues to authorize thousands of cows and sheep to graze in the complex, indicating that the land could sustain far more horses than the current Appropriate Management Level (AML).

As alluded to above, range assessments are largely outdated. New assessments are needed to determine the actual carrying capacity of the land. These assessments should include the total forage available in each Herd Management Area (HMA) for all users, including livestock, wild horses and burros, and other wildlife. Horses and burros should be given a fairer allocation of forage resources consistent with the Wild Free-Roaming Horses and Burros Act, which states that HMAs are principally, though not necessarily exclusively, for the welfare of wild horses and burros. The agency should consider recent scientific research showing the ecological services provided by horses and burros, such as their usefulness in digging water wells in desert areas that provide water for all types of wildlife species—a particularly valuable effort during this time of climate change. The agency should also take key habitat restoration measures by focusing on water infrastructure and revegetation of the land.

For any roundups that do occur going forward, BLM should take more steps to ensure accountability for the agency and safety for the horses. Installing cameras on helicopters and at trap pens could help to ensure compliance with established animal welfare standards. Increasing the space afforded to each horse and burro at these crowded short-term holding facilities could also go a long way to decreasing fatalities.

Furthermore, there are better ways to humanely and effectively manage America's wild horses. Instead of accelerating removals, stockpiling horses, and conducting cruel surgical sterilizations, the BLM can implement a robust humane, reversible fertility control plan with immunocontraceptive vaccines. As NAS noted, these vaccines are the most effective way to manage populations. It further warned that "[t]he continuation of 'business-as-usual' practices will be expensive and unproductive for BLM."

I appreciate that the agency plans to increase the use of fertility control vaccines this year, with 2,300 mares scheduled to receive the vaccine. However, the vaccine program must be much more robust in order to obtain positive results, achieve management goals, and avoid compensatory reproduction. I acknowledge that BLM has cited logistical difficulties in administering the vaccines, but that challenge seems to be a much more cost-effective solution than doubling the number of holding facilities over the next five years, with no end in sight.

The costs to taxpayers and animal welfare under the May 2020 removal plan are unjustified, and I ask that you halt any additional roundups until the aforementioned concerns are addressed. I would appreciate your consideration and look forward to working with you to implement effective and humane solutions moving forward that will protect these American icons for generations to come.

As always, I remain,

Most sincerely,



Steve Cohen  
Member of Congress